

3. Most recently, I served on the City council from 2007 to 2015 as the representative of former District C in the 8-0 election system.
4. Cody Ray Wheeler is the representative of District D on the City council.
5. In District D, Anglos constitute a majority of the eligible voters. When Mr. Wheeler was elected to represent District D in 2015 I believe he would not have won if he had a Hispanic name or surname.
6. Mr. Wheeler succeeded in his campaign in 2015 because Anglo voters also voted for him. Latinos have an equal opportunity to elect their candidate of choice in District D but only if Anglos also favor the Latino-preferred candidate.
7. In District D, a lot of turnout comes from the neighborhood of Golden Acres. Golden Acres is an older neighborhood. Although it mixed in terms of ethnicity, the Anglo voters are older and more likely to turn out.
8. Around the Pasadena Veterans Memorial Stadium, which is in District D, the neighborhoods have some high value homes and have a more heavily Anglo population. This area always produces significant turnout.
9. There is a majority Anglo senior citizen living center in the eastern part of District D called Primrose of Pasadena. Turnout is very high among the seniors there.
10. Because a number of the areas in District D that produce significant turnout are majority Anglo or ethnically mixed with higher Anglo turnout, I believe that Latinos alone cannot control the outcome of elections in District D.

Pursuant to 28 U.S.C. 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 29, 2016 in Pasadena, Texas.



Don Harrison